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American Athletic Association of the Deaf

Before the

Federal Communications Commission

Washington, D.C.

Executive Director

Shirley H. Platt

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In the Matter of)

Closed Captioning and Video Description)

of Video Programming)

)

Implementation of Section 305 of the)

Telecommunications Act of 1996)

)

Video Programming Accessibility)

)

Comments of)

American Athletic Association of the Deaf, Inc.

1. Introduction

The American Athletic Association of the Deaf is an organization recognized by the United States Olympic Committee as representing sports among deaf athletes. We have over 15,000 members in various sports specific organizations. Our membership has a very deep interest in closed captioning of video programs, especially that of sports captioning. We thank the FCC

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for this opportunity to comment. We wish to also express our support for the comments submitted by the National Association of the Deaf and by the Consumer Action Network in this proceeding.

2. Transition Schedule:

We feel that the proposed transition schedule of eight years for new programming is too long. The alternative of ten years is even worse. We believe that four years (25% each year) is sufficiently generous for the major networks and cable providers, including the premium and pay-per-view channels. Already most prime time programming is closed captioned so the burden of captioning the remainder is not great. The longer transition schedule is appropriate for the lesser cable channels and local channels.

3. Standards for quality and accuracy:

It would be a mistake not to establish at least minimum standards for quality and accuracy. Of what good are captions if they are not accurate? Given the fact that anyone with a good computer and the proper software can go into the captioning business, it is obvious that some control is necessary. Already there are problems with quality, not to mention accuracy. The FCC should establish a requirement that pre-recorded programs be accurately captioned and that the captions be properly positioned. Leaving it to a "grievance" procedure is not satisfactory since this is a cumbersome after-the-fact procedure which assumes that the consumer has knowledge of the proper persons to contact, the phone numbers or addresses, etc., and could very well also involve the expense of a long-distance call.

4. Exemptions:

We concur that sports programming should not have a general exemption. The current trend toward putting microphones on referees for the benefit of the audience is compounding the difficulty in understanding for the non-hearing viewer. We further agree that closed captioning of locally produced college or high school sports should be encouraged but can be exempted. For an exemption rule, we would propose that it be simple: If the broadcast is accompanied by play commentary by paid commentators, then it should be closed captioned.

These are brief comments because we wish to emphasize our concurrence and support for the more extensive comments of the National Association of the Deaf and the Consumer Action Network, of which we are a member. We strongly encourage the FCC to adopt the standard that if the program requires audio to be understood then it should be closed captioned without exception. Only then will the full intent of the law be accomplished.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shirley H. Platt". The signature is fluid and cursive, with the first name "Shirley" being more prominent than the last name "Platt".

Shirley H. Platt

Executive Director

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